



# ecology and environment, inc.

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International Specialists in the Environment

## M E M O R A N D U M

DATE: November 9, 1989  
TO: Alan Altur, U.S. EPA  
FROM: Stanley Senger, FIT *SS*  
SUBJECT: FILO572SA/F05-8808-022, Export Packaging  
site/ILD038409975

This memorandum is in response to comments submitted by the Illinois Environmental Protection Agency (IEPA) dated September 20, 1989, regarding the site inspection report prepared by Ecology and Environment-FIT (E & E-FIT) on August 3, 1989, for the Export Packaging site.

E & E-FIT has reviewed these comments and taken them into consideration. The IEPA comments have been added to the site file and the following are E & E-FIT's responses.

1. The exact location of Milan public well #3 has been determined to be just less than 3-miles from the site. As a consequence, the SSIR text, page 5-3, has been changed to reflect an increase in the target population using groundwater from the aquifer of concern within 3-miles of the site. This change also required the deletion of one reference and the addition of another reference to the bibliography section of the report. The Final HRS-score package also reflects the added population on groundwater, as does all relevant pages of the 2070-13 form.
2. In response to the IEPA comment regarding the E & E-FIT soil sampling method used at the site, shallow soil samples were collected for the following reasons:
  - o The approved Work Plan dated July 7, 1988, called for 5 soil samples to be collected at a depth of approximately 6 inches; and
  - o The presence of predominantly clayey soils in the area of the site led FIT to believe that a shallow soil sample scheme was more appropriate than a deep soil sampling scheme.

4053:rw

EPA Region 5 Records Ctr.



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Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-6761

September 20, 1989

Mr. Allen Alter  
Pre-Remedial Program  
U.S. EPA  
Region V  
230 S. Dearborn  
Chicago, IL 60604

RECEIVED  
SEP 27 1989  
Pre-Remedial Unit  
RECEIVED  
SEP 27 1989  
SUPERFUND PROGRAM  
MANAGEMENT BRANCH

Dear Mr. Alter:

The Illinois Environmental Protection Agency has recently reviewed the Draft screening site inspection report for Export Packaging and is happy to provide the following comments.

Sampling Activities:

Illinois EPA records indicate that a company representative of Export Packaging has admitted to dumping a significant quantity of trichloroethane at this site in the late 1970's and early 1980's. Yet the FIT contractor apparently confined their soil sampling activities to the upper one-foot of soil.

In instances where a volatile compound is deemed to be the containment of concern, deeper soil sampling should be employed. Without this appropriate sampling approach, the overall findings and conclusions drawn in this report may be called into question.

Groundwater Uses:

Paragraph 2 on page 5-3 is in error. Milan public well number 3 is located less than three miles from this site. Not only the text, but the pre and projected scoring package should be corrected to reflect this.

We thank you for the opportunity to provide these comments, and trust they will be helpful to you in your evaluation of this report. Should you have any questions concerning these comments, please feel free to contact me at the above referenced telephone number.

Sincerely,

Thomas Crause  
Pre-Remedial Program Manager  
State Site Management Unit  
Remedial Project Management Section  
Division of Land Pollution Control

TC:pss

N  
16.08

Go Final

Site Inspection Evaluation Form

SI for Export Packaging State Illinois ID No. 10038409975  
Reviewer EPA: Alan Butler  
State: \_\_\_\_\_  
Date of Approval EPA: 10/6/89 State: \_\_\_\_\_

	Possible Points	Score	Specific Comments
<u>Transmittal Memo:</u>	(6)	6	
<u>Site Background:</u>	(20)	20	
<u>Procedures:</u>	(5)	5	
<u>Migration Pathways:</u>	(20)	19	
<u>Appendix A Maps:</u>	(10)	10	
<u>Appendix B SI Form:</u>	(10)	10	
<u>Appendix C Removal Checklist:</u>	(5)	0	
<u>Site Referred to ERB Date</u> _____			
<u>Appendix D Photographs:</u>	(5)	4	
<u>Appendix E Analytical Results:</u>	(13)	13	
(Section 4)			
<u>Appendix F: Well logs</u>	(6)	6	
Rejected after second submittal		Subtotal <u>93</u>	
		(-10)	
		Total	

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